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Compilation on the Comoros

Report of the Office of the United Nations High Commissioner for Human Rights

I. Background

1. The present report was prepared pursuant to Human Rights Council resolutions 5/1 and 16/21, taking into consideration the periodicity of the universal periodic review. It is a compilation of information contained in reports of treaty bodies and special procedures and other relevant United Nations documents, presented in a summarized manner owing to word-limit constraints.

II. Scope of international obligations and cooperation with international human rights mechanisms and bodies[1, 2]

2. The Office of the United Nations High Commissioner for Human Rights (OHCHR) noted that the Comoros had acceded to the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment in 2017.[3]

3. In 2018, the Office of the United Nations High Commissioner for Refugees (UNHCR) noted with concern that the Comoros had not acceded to the 1951 Convention relating to the Status of Refugees, its 1967 Protocol, the 1954 Convention relating to the Status of Stateless Persons or the 1961 Convention on the Reduction of Statelessness.[4]

4. In 2018, the United Nations country team noted that, since the second universal periodic review, the Comoros had signed or ratified a number of international instruments, including the Convention on the Rights of Persons with Disabilities and a number of International Labour Organization (ILO) conventions. The Comoros continued to encounter numerous obstacles to the effective fulfilment of its commitments, however. Those obstacles were caused by a failure to act on the recommendations made under international conventions, the shortage of human and financial resources of the institutions responsible for follow-up to the recommendations and other shortcomings.[5]

5. UNHCR recommended that the Comoros ratify the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the Optional Protocol to the Convention against Torture and the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families.[6]

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6. In 2018, the United Nations Educational, Scientific and Cultural Organization (UNESCO) expressed regret that the Comoros had not submitted reports either to the United Nations treaty bodies or to UNESCO since 2011, a situation that made it impossible to have sufficient and up-to-date information on new legislative and political measures adopted with a view to fulfilling human rights commitments. The Comoros should therefore be encouraged to submit reports on its implementation of international instruments, including those of UNESCO, more regularly.[7]

7. The United Nations country team regretted that the Comoros did not have a permanent institutional system to coordinate the steps taken by the Government with regard to its commitments to international mechanisms and to giving effect to recommendations, monitoring progress and producing national reports. Several periodic reports on instruments ratified by the country had not been completed on time, for instance.[8]

8. The country team noted that the General Delegation for Human Rights had forged ties with OHCHR. Discussions were infrequent, however, and the country team was of the view that they should take place more regularly.[9]

III. National human rights framework[10]

9. The country team reported that, since its second universal periodic review, the Comoros had adopted an act on combating violence against women and an act on the promotion and protection of the rights of persons with disabilities.[11]

10. The country team noted that Act No. 11-028/AU of 23 December 2011 on the National Commission on Human Rights and Freedoms had been put into effect by Decree No. 12-042/PR of 18 February 2012. However, the new Commission had met only until July 2017, and the term of the 15 members had still not been renewed.[12] The country team continued to call for the re-establishment of the Commission, which provided an opportunity for the country to create an environment conducive to respect for human rights.[13]

11. The country team regretted that the Criminal Code and the Code of Criminal Procedure adopted by the Assembly of the Union of the Comoros in December 2014 had still not entered into force.[14]

12. The country team noted with satisfaction that the Comoros was organizing a general population census.[15]

IV. Implementation of international human rights obligations, taking into account applicable international humanitarian law

A. Cross-cutting issues

1. Equality and non-discrimination[16]

13. UNESCO indicated that equality of opportunity was still very much unrealized in the Comoros. For instance, levels of educational attainment varied greatly, in particular by income level, sex and location. Similarly, the acquisition of basic skills was still very unequal: the literacy rate, which was as high as 90 per cent in urban areas, was only 75 per cent in rural areas.[17]

14. UNHCR regretted that only men had the right to transmit their Comorian nationality to their foreign spouses. It recommended that the Comoros amend the law in order to enable Comorian men and women to enjoy equal rights to pass on their Comorian nationality to non-Comorian spouses.[18]

15. UNESCO recommended that the Comoros be encouraged to ratify the UNESCO Convention against Discrimination in Education of 1960 and possibly request technical support from UNESCO for that process.[19]

2. Development, the environment, and business and human rights[20]

16. The country team reported that in 2018 the Comoros had adopted a revised strategy for accelerated growth and sustainable development that drew on a vision of the country's emergence by 2030 and encompassed the Government's priorities, the 2030 Agenda for Sustainable Development and Agenda 2063 of the African Union. Steps had been taken in the customs service as part of the 2010–2019 strategy for public finance reform. In particular, practical measures taken in 2016 had made it possible to increase tax revenues. Moreover, a reform of the General Tax and State Property Authority had been initiated, although considerable efforts were needed to see it through to completion, including centralizing taxation authority in the Union of the Comoros and its constituent islands.[21]

17. With regard to the environment, the country team noted that in 2017 the Comoros had prepared a bill on the national system of protected areas, the aim of which was to preserve the biodiversity of the Comoros, and that in November 2016 the National Assembly had adopted the Act authorizing ratification of the Paris Agreement.[22]

B. Civil and political rights

1. Right to life, liberty and security of person[23]

18. The country team found it regrettable that the Comoros had not ratified the Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty, and that it had not abolished the death penalty.[24]

19. The country team noted that the homicides that had been committed over the previous two years had been investigated but that the investigations had not led to convictions. Those shortcomings were largely the result of insufficient application of the relevant judicial and legislative instruments and of a shortage of human, technical and financial resources.[25]

20. The country team was concerned by reports that killings of children had taken place in the Comoros as a result of unwanted pregnancies and the lack of facilities for the care of those children.[26]

21. The country team noted that, during the second universal periodic review, the Comoros had accepted several recommendations on prison administration, including recommendations that it take measures to improve the conditions of detention, in respect of food and sanitation in particular, and to strengthen the independence of monitoring mechanisms. Those recommendations had not been acted on, however, and the prisoners' rights situation was still troubling. Conditions of detention were still inhuman and degrading, and thorough investigations had not been conducted to determine the causes of and liability for deaths in detention.[27]

22. The ILO Committee of Experts on the Application of Conventions and Recommendations requested the Comoros to take the necessary measures to ensure that a draft text to amend Order No. 68-353 of 1968 was adopted and that the new legislation regulating work by prisoners explicitly provided that remand prisoners awaiting trial should not be required to work in prison.[28]

2. Administration of justice, including impunity, and the rule of law[29]

23. According to the country team, the administration of justice had undergone considerable change in the preceding years. In 2015, after the organization in July 2013 of the first examination for admission to the legal profession, some 27 lawyers had been admitted to the Moroni and Anjouan (Mutsamudu) bar associations. The number of specialized attorneys and bailiffs had also increased. In addition, magistrates and clerks had been appointed.[30] The independence of the judiciary had continued to come under attack,

however. The country team was concerned about the improper recruitment of magistrates, in violation of statutory rules, the abusive subordination of the Public Prosecutor's Office to the executive, the lack of training, dilapidated and unhealthy premises and insufficient and obsolete equipment.[31]

24. The country team regretted that the length of police custody and pretrial detention did not always meet the requirements set out by the Code of Criminal Procedure. Lawyers continued to regularly denounce non-compliance with the requirements for police custody and the abusive placement in pretrial detention of suspects who did not pose a real risk to public order.[32]

25. The country team was concerned to note that by a decision of 12 April 2018, the President of the Comoros had used his special powers, defined in the Constitution, to temporarily transfer the powers of the Constitutional Court to the Supreme Court. It noted that the draft Constitution of 30 July had confirmed the abolition of the Constitutional Court.[33]

3. Fundamental freedoms and the right to participate in public and political life[34]

26. The country team reported that Act No. 13-010/AU of 21 November 2013, on the organization and operations of political parties and groups in the Comoros, had been put into effect by Decree No. 14-012/PR of 10 January 2014. The Act's entry into force had resulted in a significant drop from about 40 to 6 in the number of political parties recognized as complying with the new Act. Despite legally established rights, the country had experienced a deterioration in the human rights situation and a restriction of public freedoms, as shown by such developments as the prohibition by the executive authorities of peaceful opposition demonstrations or assemblies, arbitrary and violent arrests of politicians and the closure of some media outlets, including community radio stations. Suspects had been placed in pretrial detention, often for longer than the law allowed.[35]

27. The country team noted that, despite constitutional guarantees, violations of the freedoms of religion and belief had been observed. Laws in force could interfere with the people's enjoyment of their right to freedom of religion and belief and thus put the Comoros in a position in which its domestic laws and the conventions and treaties to which it was a party were incompatible.[36]

4. Prohibition of all forms of slavery[37]

28. The country team stated that Comoros was still not fully compliant with the minimum standards for the elimination of trafficking in persons and was not making significant efforts to that end.[38] In addition, the country team noted with concern that psychological care for victims of trafficking in persons in the centres for victims that were already in place had not been made more widely available.[39]

29. The country team regretted that the Comoros had still not ratified the United Nations Convention against Transnational Organized Crime and the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime.[40]

C. Economic, social and cultural rights

1. Right to work and to just and favourable conditions of work[41]

30. The country team noted that the Comoros had a decent work country programme. The implementation of that programme had been made official on 4 May 2015 with the signature of a memorandum of understanding by the International Labour Office and the Government of the Comoros. In addition, the Comoros had ratified a large number of ILO conventions. To ensure that the rights of workers that originated in international norms could in fact be exercised, however, efforts were still to be made. The effective implementation of the conventions was also hindered by the people's lack of awareness of their rights and obligations, including such key actors as national lawmakers and members of the judiciary.[42]

31. The country team was concerned to note that there were multiple violations of workers' rights in the Comoros, given the instability of employment in the country and the high rate of unemployment, which was 50.5 per cent for persons under 24 years of age. In addition, hiring was selective, and being hired depended on criteria other than the traditional standards of competence. In public service, being hired, especially for more senior positions or in some State-owned companies, depended on a person's political affiliation. In addition, the labour inspection system had not yet begun operating because of a lack of qualified inspectors. However, the Ministry of Labour, with the support of ILO, had adopted a plan for the modernization of labour affairs. The major challenge was to implement the plan.[43]

32. The country team indicated that progress had been made in public service employment, as the proportion of female public servants had increased by 10 percentage points, from 30 per cent in 2005 to 40 per cent in 2014. Women's representation in salaried work, which had gone from 18 per cent in 1995 to 24 per cent in 2012, had also increased. However, more also needed to be done to reduce high unemployment among young people, more than half of whom were out of work. Inactivity was more prevalent among young women than among young men: in urban areas, 60 per cent of young women, as opposed to 50 per cent of young men, were inactive, while in rural areas 54.4 per cent of young women, as opposed to 49.5 per cent of young men, were inactive; 36 per cent of women, as opposed to more than 64 per cent of men, had entered the labour market. Those gender inequalities, particularly in access to employment, were the result of factors such as the non-enforcement of existing laws and a lack of transparency.[44]

33. The country team noted with concern that in 2016, nearly 3,000 young people had been dismissed from public service without being given any form of support. The merger of the administration of the Union of the Comoros and those of the islands could lead to public service job cuts.[45]

34. The ILO Committee of Experts noted that section 7 of the Labour Code provided that persons who had left their jobs or occupation could continue to be members of a trade union for a maximum of two years, provided that they had been in that occupation for at least one year. The ILO Committee requested that the Comoros take the necessary measures to amend section 7 of the Labour Code so that the question of continued membership of a trade union was determined by the constitutions and rules of the trade union in question.[46]

35. The ILO Committee of Experts also requested that the Government take the necessary measures to amend the relevant legislation to allow the exercise of the right to strike in the context of the settlement of a collective dispute.[47]

2. Right to social security

36. According to the country team, a large proportion of workers, given the considerable magnitude of the informal economy, were not afforded the protection guaranteed by law.[48]

3. Right to an adequate standard of living[49]

37. The country team recommended that the Comoros diversify the range of international donors with which it partnered with a view to securing technical and financial assistance to better combat poverty.[50]

4. Right to health[51]

38. The country team noted that, in the health sector, the Comoros had a national health policy document (2015–2024) and a national health development plan (2015–2019) currently under implementation. The Comoros was also rolling out strategies for universal health coverage. In June 2017, moreover the National Assembly had adopted the Universal Health Coverage Act, which had been put into effect by presidential decree in October 2017. The country team likewise noted that the Ministry of Health, mandated by the Government to lead the roll-out of universal health insurance starting in 2019, needed support to overcome challenges related to governance, leadership and especially sectoral

coordination of the efforts made in the health system with a view to ensuring the implementation of those policies.[52]

39. The country team reported that women's health indicators, including reproductive health, were improving. Reducing maternal and infant mortality rates had been placed at the core of the objectives pursued by health policies and strategies, thus making maternal and child health key concerns of the public authorities. The main problems in that area included the lack of support measures to reduce the costs of reproductive health care and the inadequate technical capacity of the health-care services. The country team also noted that little use was made of family planning services and that maternal mortality was relatively high.[53]

40. In the country team's view, the challenges were to protect the right to health of women and young people by raising the quality of and demand for maternal, child and newborn health services, in particular by enhancing the technical capacity of service providers and providing health facilities with the medication and equipment to manage obstetric and neonatal emergencies.[54]

41. The country team added that the country had had an HIV/AIDS epidemic that had held steady at low levels since 2014. As a result of prevention initiatives, the prevalence of HIV/AIDS in 2017 was 0.07 per cent among the population aged 15 to 49. Between 2014 and 2017, the prevalence among young people (aged 15 to 24) was and 0.10 per cent. The number of new infections had fallen between 2014 and 2017.[55]

5. Right to education[56]

42. UNESCO pointed out that, during the previous universal periodic review, the recommendations that the Comoros had been given had focused chiefly on the need to ensure that, to eradicate illiteracy, everyone, including children with disabilities and girls, had the right to a high-quality education, primary education in particular.[57] In that regard, UNESCO noted that several educational programmes and policies had been developed and put into effect in the Comoros in recent years, including the Interim Education Plan 2013–2015, which had been extended by the Education Transition Plan 2017–2020.[58]

43. Education, according to the country team, was a priority for the Government of the Comoros. Sector financing and education expenditures in the State budget had increased from 9.8 billion Comorian francs in 2012 to 11.6 billion in 2015, an annual average growth rate of 3.4 per cent over the four years.[59] Progress, not least in respect of access, had thus been made in education in recent years, and preschool and primary education were expanding rapidly. The net rate of enrolment in primary education was 81 per cent. Ninety-two per cent of primary school leavers transitioned to secondary school. However, retention rates in primary and secondary education, at around 40 per cent, were still very low, and repetition rates, at around 17 per cent, were still high. It was estimated that about 17,000 of the 117,000 children of primary school age had never attended school and that 5,000 children had dropped out of school during their primary education. Thus, about 22,000 children of primary school age were not attending any sort of educational institution.[60]

44. UNESCO was concerned to note that in the Comoros less than 5 per cent of schools had single-sex toilet facilities.[61]

45. The ILO Committee of Experts noted that the capacity of schools was very limited and that some primary and secondary schools were obliged to refuse to enrol certain children of school age. Consequently, a large number of children, particularly from poor families and disadvantaged backgrounds, were deprived of an education. It requested that the Comoros intensify its efforts to increase the school attendance rate and reduce the drop-out rate, especially among girls, in order to prevent children under 15 years of age from working.[62]

46. UNESCO recommended that the Comoros take a number of legislative and policy measures. In particular, it should provide equal opportunities and enhance inclusion in education by adopting policies to provide improved educational opportunities for girls, children with disabilities and children from rural or low-income backgrounds; continue making efforts not only to increase enrolment but also to promote the retention of children

in schools and the acquisition of basic skills, with a view to eradicating illiteracy, and improve the working conditions, pay and training of teachers in order to improve the quality of the education system.[63]

47. UNESCO found it regrettable that neither the Constitution nor Framework Education Act No. 94/035/AF of 20 December 1994 made any mention of any guarantee of free education at any level. UNESCO recommended that the Comoros take both constitutional and legislative steps to strengthen the legal framework guaranteeing the right to education and, more specifically, that it bring its domestic legal provisions into line with international standards and obligations, including those laid out in the Convention on the Rights of the Child. UNESCO also recommended that the Comoros take legislative and practical measures to further ensure the inclusion of all children and learners, including girls and persons with disabilities.[64]

48. UNESCO likewise recommended that education reforms cover relevant laws and that the Comoros seek the technical support it could provide.[65]

D. Rights of specific persons or groups

1. Women[66]

49. The country team noted with concern that, in the area of violence against women, harmful practices such as sexual violence, sexual harassment and child marriage persisted. According to the activity reports of counselling services, the number of cases of violence and abuse was increasing. In 2015 and 2016, for example, counselling services had recorded a total of 759 cases of violence against women and child abuse. Efforts were being made by the Government and civil society, with the support of partners, to curb that violence, but the results were still inconclusive.[67]

50. The country team added that thematic development groups had been established at the Gender Office and that Office's partnerships with non-governmental organizations had been strengthened. The review of the National Policy on Gender Fairness and Equality and the development of a national strategy to combat gender-based violence and the thematic platforms on gender-based violence had been undertaken to support the system for combating such violence.[68]

51. The country team noted the Act on the introduction of measures to further the advancement of women in respect of access to appointed and elected office, which had been adopted unanimously by the Assembly of the Union of the Comoros on 22 June 2017. The Head of State's signature of the decree that would put it into effect was pending. The country team found it regrettable, however, that the participation of Comorian women in political life was, in general, still fairly limited. Despite the legislative and legal framework, within which men and women were granted equal rights, women were very poorly represented in the State institutions. At the executive level, only 3 of the 15 ministers, or 20 per cent, were women. The proportion of female lawmakers was also very low. A single member of the 33-member Assembly of the Union (3 per cent) was a woman. Only 4 of the country's 54 communes, or 7 per cent, were run by female mayors.[69]

2. Children[70]

52. The ILO Committee of Experts was concerned that child labour was a visible phenomenon in the country, particularly as a result of poverty and of the low school enrolment rate in some cases. It strongly encouraged the Comoros to take the necessary steps to make education compulsory until the minimum age for admission to employment, namely 15 years.[71]

53. The country team reported that a new children's policy had been adopted by the Government in 2016. The aim of the policy was ultimately to contribute to the creation of an environment in which the children of the Comoros were protected from harm and all forms of physical or mental violence, injury or abuse, from being abandoned or treated negligently and from ill-treatment or exploitation, including child labour and sexual abuse.[72] The new policy had led to the identification of numerous violations of children's

rights in general and those of the most vulnerable in particular, who were victims of various forms of economic exploitation, ill-treatment, sexual abuse and neglect.[73]

54. The country team reported that the National Youth Policy had been approved in December 2017.[74]

3. Persons with disabilities[75]

55. The country team referred to a recent study showing that 41.5 per cent of the persons with disabilities in the Comoros who had attended school had a primary school education, 26.7 per cent had had access to secondary education and only 2.9 per cent had had access to post-secondary education. The results of that study highlighted the gap between the enrolment rate of children with disabilities and that of those without. The country team added that in 2017, in the wake of the development and launch of the National Strategy for Basic Education for Children with Disabilities 2017–2026, the number of children with disabilities included in the national education system had been 1,231.[76]

4. Migrants, refugees, asylum seekers and internally displaced persons[77]

56. UNHCR was concerned that the immigration law established that foreigners who were refused entry to the country could be detained for as long as necessary to arrange for their departure. Such a provision could lead to indefinite detention periods if, for any reason, deportation or repatriation could not be arranged.[78]

57. While, to its knowledge, there were currently no asylum seekers, refugees or stateless persons in the country, UNHCR was concerned that the Comoros did not have a national legislative framework on asylum or any laws or procedures that clearly established the rights and safeguards to which asylum seekers and refugees were entitled. UNHCR recommended that the Comoros enact national asylum legislation and establish a functioning national asylum framework for ensuring international protection, which included procedures for refugee status determination in line with international standards.[79]

5. Stateless persons[80]

58. UNHCR regretted the lack of laws establishing procedures for statelessness status determination or providing a framework for the protection for stateless persons in the country. Additionally, the Comorian nationality law provided no legal safeguard that children born in the country who would otherwise be stateless acquired nationality by operation of the law. UNHCR recommended that the Comoros amend law No. 79-12 of 1979 on nationality to enable children born in the Comoros who would otherwise be stateless to acquire Comorian nationality by operation of the law.[81]

Notes

[1] Tables containing information on the scope of international obligations and cooperation with international human rights mechanisms and bodies for the Comoros will be available at www.ohchr.org/EN/Countries/AfricaRegion/Pages/KMIndex.aspx.

[2] For relevant recommendations, see A/HRC/26/11, paras. 110.2–110.6, 110.10–110.17, 110.27–110.31, 111.1–111.9, 112.1 and 112.10.

[3] OHCHR, "Highlights of results", in *OHCHR Report 2017*, p. 8.

[4] UNHCR submission for the universal periodic review of the Comoros, p. 1.

[5] United Nations country team submission for the universal periodic review of the Comoros, paras. 1–2.

[6] UNHCR submission, pp. 2–3.

[7] UNESCO submission for the universal periodic review of the Comoros, para. 12.

[8] United Nations country team submission, para. 13.

[9] Ibid., para. 14.

[10] For relevant recommendations, see A/HRC/26/11, paras. 110.18–110.21.

[11] United Nations country team submission, para. 4.

[12] Ibid., para. 5.

[13] Ibid., para. 45.

[14] Ibid., para. 27.
[15] Ibid., para. 12.
[16] For relevant recommendations, see A/HRC/26/11, paras. 113.1–113.6.
[17] UNESCO submission, para. 13.
[18] UNHCR submission, pp. 1 and 4.
[19] UNESCO submission, para. 10.
[20] For relevant recommendations, see A/HRC/26/11, paras. 110.94, 110.98 and 110.101–110.102.
[21] United Nations country team submission, paras. 6–7.
[22] Ibid., para. 10.
[23] For relevant recommendations, see A/HRC/26/11, paras. 110.1–110.9 and 110.55–110.62.
[24] United Nations country team submission, para. 16.
[25] Ibid.
[26] Ibid.
[27] Ibid., para. 21.
[28] See www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3337530.
[29] For relevant recommendations, see A/HRC/26/11, paras. 110.58, 110.62 and 112.11.
[30] United Nations country team submission, para. 17.
[31] Ibid., para. 18.
[32] Ibid., para. 19.
[33] Ibid., para. 20.
[34] For relevant recommendations, see A/HRC/26/11, paras. 110.63, 110.100, 112.12–112.13 and 113.7–113.8.
[35] United Nations country team submission, para. 22.
[36] Ibid., para. 24.
[37] For relevant recommendations, see A/HRC/26/11, paras. 110.53 and 112.7.
[38] United Nations country team submission, para. 26.
[39] Ibid., para. 27.
[40] Ibid.
[41] For relevant recommendations, see /HRC/26/11, paras. 110.64–110.66.
[42] United Nations country team submission, para. 28.
[43] Ibid., para. 29.
[44] Ibid., para. 15.
[45] Ibid.
[46] See www.ilo.ch/dyn/normlex/de/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3343986:YES.
[47] Ibid.
[48] United Nations country team submission, para. 28.
[49] For relevant recommendations, see A/HRC/26/11, paras. 110.66–110.68, 110.77, 110.95–110.97 and 110.99.
[50] United Nations country team submission, para. 3.
[51] For relevant recommendations, see A/HRC/26/11, paras. 110.69–110.76.
[52] United Nations country team submission, para. 11.
[53] Ibid., paras. 30 and 32.
[54] Ibid., para. 33.
[55] Ibid., para. 30.
[56] For relevant recommendations, see A/HRC/26/11, paras. 110.76–110.90.
[57] UNESCO submission, para. 9.
[58] Ibid., para. 11.
[59] United Nations country team submission, para. 34.
[60] Ibid., para. 35.
[61] UNESCO submission, para. 13.
[62] See www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:13100:0::NO::P13100_COMMENT_ID:3337546.
[63] UNESCO submission, para. 14.
[64] Ibid., para. 13.
[65] Ibid.
[66] For relevant recommendations, see A/HRC/26/11, paras. 110.39–110.52 and 110.85–110.88.
[67] United Nations country team submission, para. 38.
[68] Ibid., para. 37.
[69] Ibid., para. 25.
[70] For relevant recommendations, see A/HRC/26/11, paras. 110.54, 110.92–110.93, 112.4, 112.6 and 112.8.

[71] See www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:13100:0::NO::P13100_COMMENT_ID:3337546.

[72] United Nations country team submission, para. 39.
[73] Ibid., para. 40.
[74] Ibid., para. 8.
[75] For relevant recommendations, see A/HRC/26/11, paras. 110.88 and 110.91–110.94.
[76] United Nations country team submission, para. 41.
[77] For the relevant recommendation, see A/HRC/26/11, para. 110.15.
[78] UNHCR submission, p. 2.
[79] Ibid., pp. 1 and 3.
[80] For the relevant recommendation, see A/HRC/26/11, para. 112.6.
[81] UNHCR submission, pp. 1 and 4.